

***Remarks***

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 24-44 are pending in the application, with claim 24 being the independent claim. Claims 24 and 42 are sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 112***

Claims 24 and 42 were rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. Specifically, the Office Action stated that "[c]laim 24, lines 3-4 and 10 and claim 42, line said 'a first set of security association information' and 'a second set of security association information', the examiner can not find this two set on the specification." (Office Action, p. 2). Applicants respectfully traverse this rejection.

The fundamental factual inquiry for determining compliance with the written description requirement is "whether the specification conveys with reasonable clarity to those skilled in the art that, as of the filing date sought, applicant was in possession of the invention as now claimed." M.P.E.P. § 2163.02, *citing Vas-Cath, Inc. v. Mahurkar*, 19 U.S.P.Q.2d 1111, 1117 (Fed. Cir. 1991).

The specification provides adequate written description for claims 24 and 42. As discussed in Applicants' specification, "[t]he distributor unit 206 determines if a

packet is ready for IPSec processing, and if so, distributes the security association information (SA) received from the packet classifier unit 204 and the packet data among a plurality of cryptography processing engines 124, in this case four, on the chip 200, for security processing." (Specification, p. 8, lines 19-23). Thus, the security association information distributed to cryptography processing engines 124 may be considered the first set of security association information. Applicants' specification further describes that the distributor unit may update shared IPSec per-flow data for a packet as well update a set of data (e.g., sequence numbers, anti-replay detection masks) after downstream cryptographic processing is completed. (Specification, p. 8, lines 31-33; p. 9, lines 22-30). The per-flow data for a packet and the set of data updated after cryptographic processing are both examples of a second set of security association information.

These citations, among others, show that the specification describes the claimed invention in sufficient detail that one skilled in the art can reasonably conclude that the inventor had possession of the claimed invention. See, e.g., *Moba, B.V. v. Diamond Automation, Inc.*, 325 F.3d 1306, 1319, (Fed. Cir. 2003). A description as filed is presumed to be adequate, unless or until sufficient evidence or reasoning to the contrary has been presented by the examiner to rebut the presumption. See, e.g., *In re Marzocchi*, 439 F.2d 220, 224, 169 USPQ 367, 370 (CCPA 1971). The Examiner has the initial burden of presenting by a preponderance of evidence why a person skilled in the art would not recognize in an applicant's disclosure a description of the invention defined by the claims. M.P.E.P. §2163, citing *In re Wertheim*, 541 F.2d 257, 263 (CCPA 1976).

Based on the foregoing, Applicant respectfully submits that the specification provides adequate support for claims 24 and 42 and furthermore, that the Examiner has not met the burden of presenting by a preponderance of evidence why a person skilled in the art would not recognize in an Applicant's disclosure a description of the invention defined by the claims. Reconsideration and withdrawal of the rejection are therefore respectfully requested.

***Rejections under 35 U.S.C. § 103***

**Leung, Gunter, and Chang**

In the Office Action, claims 24-26, 28-32, 36-41, 43, and 44 were rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Leung, U.S. Patent 6,760,444 (Leung), in view of Gunter, et al, U.S. Patent 6,751,728 (Gunter), and further in view of Chang, et al, U.S. Patent 6,862,278 (Chang). Applicants respectfully traverse this rejection.

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the references. *In re Royka*, 490 F.2d 981 (CCPA 1974). Applicants submit that the combination of Leung, Gunter, and Chang does not teach or suggest each and every element of Applicants' amended independent claim 24.

In the Office Action, the Examiner appears to equate the server in Leung to the distributor unit recited in Applicants' independent claim 24. However, the server in Leung is significantly different than the recited distributor unit. Amended claim 24 recites that the distributor unit "distributes a plurality of packets in a data flow between a source and the device and a first set of security association information for

each of the plurality of packets according to a distribution scheme" and "updates a second set of security association information for a packet in the plurality of packets." The server in Leung is not configured to perform either of these functions.

Leung describes a system and method for authenticating a roaming mobile node during Mobile IP registration. (Leung, Abstract). In a mobile IP environment, in order for a roaming mobile node (now coupled to a Foreign Agent) to successfully receive messages, the roaming mobile node must register with its Home Agent. (Leung, col. 2, lines 46). In Leung, during the registration process, the mobile node "constructs a registration request message including an authenticator" and sends the request to the Home Agent over a network 504. (Leung, col. 8, lines 26-29). The Home Agent then determines the server handling the security association for the roaming mobile node and sends a packet containing the request to the server over a network. (Leung, col. 8, lines 29-50).

The server in Leung receives the packet identifying the mobile node, obtains the security association information for the mobile node identified in the packet, and sends the security association to the Home Agent over the network for authentication of the mobile node. (Leung, col. 7, lines 33-40). The server in Leung may also perform authentication processing using the security association and send a reply to the home agent indicating the status of the authentication. (Leung, col. 8, lines 51-66). Leung does not teach or suggest that the server distributes the registration request message and the associated security association information to plurality of security processing engines in the server. Instead, Leung returns a reply message, which may include security association information, to the source of the registration request message. Furthermore, Leung does not teach or suggest that the server

updates any of the security association information.

These deficiencies of Leung are not in any way remedied by Gunter or Chang. Accordingly, the combination of Leung, Gunter, and Chang does not teach or suggest "a distributor unit in the device that distributes a plurality of packets in a data flow between a source and the device and a first set of security association information for each of the plurality of packets according to a distribution scheme and updates a second set of security association information for a packet in the plurality of packets," as recited in independent claim 24.

Additionally, the combination of Leung, Gunter, and Chang does not teach or suggest "a plurality of security processing engines in the device, coupled to the distributor unit, configurable to perform authentication, encryption, or decryption functions," as recited in amended independent claim 24. In the Office Action, the Examiner acknowledges that "Leung does not teach a plurality of security processing engines in the device, coupled to the distributor unit, that perform authentication and cryptographic functions" and consequently does not teach or suggest that a plurality of security processing engines process a plurality of packets in parallel. (Office Action, p. 3). However, the Examiner alleges that the combination of Gunter and Chang teach these missing limitations.

In Gunter, after a receiving host receives a packet, the host first decrypts the packet and then authenticates it. (Gunter, col. 8, lines 64-65). Thus, the processing described by Gunter occurs sequentially on a single packet. Accordingly, Gunter does not teach or suggest "a plurality of security processing engines in the device, coupled to the distributor unit, configurable to perform authentication, encryption, or decryption functions, wherein each of the plurality of security processing engines

receives a packet and at least a portion of the first set of security association information associated with the packet, and wherein the plurality of security processing engines process the plurality of packets in parallel," as recited in amended independent claim 24.

Chang describes a "system and method for parallel compression and decompression of a bit stream." (Chang, Abstract). In the Office Action, the Examiner appears to be equating the parallel compression by multiple encode units and decompression of a bit stream by multiple decode units to the parallel processing of a plurality of packets by the security processing engines in Applicants' claim 24. However, nowhere does Chang teach or suggest that the encode and/or decode units are "configurable to perform authentication, encryption, or decryption functions."

Furthermore, in Chang, the encode or decode units do not receive security association information.

Accordingly, Chang also does not teach or suggest "a plurality of security processing engines in the device, coupled to the distributor unit, configurable to perform authentication, encryption, or decryption functions, wherein each of the plurality of security processing engines receives a packet and at least a portion of the first set of security association information associated with the packet, and wherein the plurality of security processing engines process the plurality of packets in parallel," as recited in amended independent claim 24.

Based on the above, Applicants submit that the combination of Leung, Gunter, and Chang does not teach or suggest every feature recited in Applicants' amended independent claim 24. Therefore, Applicants request favorable consideration of amended independent claim 24. For at least these reasons, and further in view of their

own features, claims 25, 26, 28-32, 36-41, 43 and 44 which depend from claim 24, respectively, are patentable over the combination of Leung, Gunter, and Chang. Reconsideration and withdrawal of the ground of rejection are therefore respectfully requested.

Leung, Gunter, Chang, Barlow

In the Office Action, claim 27 was rejected under 35 U.S.C. §103(a) as being anticipated by Leung, Gunter, Chang in view of Barlow, *et al.*, U.S. Patent No. 6,038,551 (Barlow). Applicants respectfully traverse this rejection.

Claim 27 depends from claim 24. Barlow does not overcome all of the deficiencies of the combination of Leung, Gunter, and Chang relative to claim 24 described above. For at least these reasons, and further in view of its own features, claim 27 is patentable over the combination of Leung, Gunter, Chang, and Barlow. Reconsideration and withdrawal of these grounds of rejection are therefore respectfully requested.

Leung, Gunter, Chang, Robinson

In the Office Action, claim 33 was rejected under 35 U.S.C. §103(a) as being anticipated by Leung, Gunter, Chang in view of Robinson, U.S. Patent 5,734,829 (Robinson). Applicants respectfully traverse this rejection.

Claim 33 depends from claim 24. Robinson does not overcome all of the deficiencies of the combination of Leung, Gunter, and Chang relative to claim 24 described above. For at least these reasons, and further in view of its own features, claim 33 is patentable over the combination of Leung, Gunter, Chang, and Robinson.

Reconsideration and withdrawal of these grounds of rejection are therefore respectfully requested.

Leung, Gunter, Chang, Martin

In the Office Action, claims 34-35 were rejected under 35 U.S.C. §103(a) as being anticipated by Leung, Gunter, Chang in view of Martin, U.S. Patent 5,867,706 (Martin). Applicants respectfully traverse this rejection.

Claims 34 and 35 depend from claim 24. Martin does not overcome all of the deficiencies of the combination of Leung, Gunter, and Chang relative to claim 24 described above. For at least these reasons, and further in view of their own features, claims 34 and 35 are patentable over the combination of Leung, Gunter, Chang, and Martin. Reconsideration and withdrawal of these grounds of rejection are therefore respectfully requested.

***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.



Prompt and favorable consideration of this Amendment and Reply is  
respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

A handwritten signature in black ink, appearing to read "Lori A. Gordon".

Lori A. Gordon  
Attorney for Applicants  
Registration No. 50,633

Date: December 26, 2007  
1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600